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U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

March 28, 2023

Honorable Denise Cote United States District Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, New York 10007

Re: United States v. James Velissaris,

22 Cr. 105 (DLC)

Dear Judge Cote:

The parties write to jointly propose a briefing schedule for the defendant's motion to withdraw his plea. The schedule would be as follows:

April 3, 2023 Government's opposition April 10, 2023 Defense reply

The defendant also requests a hearing, to take place after the filing of his reply. The parties are available for a hearing on May 5th, which is the soonest date the Government can be available due to its upcoming April 24 trial.

The parties further jointly request that the defendant's sentencing, and the Government's filing of its sentencing submission, be adjourned until the motion to withdraw is resolved.

DAMIAN WILLIAMS
United States Attorney

by: ____/s/
Margaret Graham
Assistant United States Attorney
(212) 637-2923

/s/
Michael A. Battle
William R. Martin (admitted pro hac vice)

Respectfully submitted,

Michelle N. Bradford (admitted *pro hac vice*)
David S. Slovick (*Entry of Appearance* forthcoming)
Erin C. Steele (*pro hac vice* pending)
BARNES & THORNBURG LLP
555 12th Street NW, Suite 1200
Washington, DC 20004